

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE:

**JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION**

This Document Relates to:

Melissa Parsons and Terry Lee Parsons,

v.

Johnson & Johnson,
Johnson & Johnson Consumer, Inc.
f/k/a Johnson & Johnson Consumer
Companies, Inc.

Civil Case No. 3:19-cv-21967-FLW

MDL No. 2738

3:16-md-02738-FLW-LHG

**SECOND AMENDED NOTICE TO TAKE VIDEOTAPED
TRIAL PRESERVATION DEPOSITION**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the *Federal Rules of Civil Procedure*, the oral and videotaped deposition of Plaintiff, **MELISSA PARSONS**, will be taken before a person authorized to administer the oath. This deposition will be videotaped for use at trial and counsel are specifically informed that Plaintiff's health is declining such that she may not be available or capable to attend trial; therefore, this deposition is intended to preserve her testimony for use before the jury. The taking of said deposition may be adjourned from day to day until completed.

DATE AND TIME OF DEPOSITION: DECEMBER 18, 2020, AT 12:00 P.M. EST

LOCATION: GARY C. JOHNSON, P.S.C.
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PIKEVILLE, KY 41502

COURT REPORTER: PAM OSBORNE
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Respectfully submitted,

/s/Michael E. Liska

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of December, 2020, a copy of the foregoing was filed via the Court's CM/ECF electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system. Notice is also being sent to involved counsel for the parties via email.

/s/ Michael E. Liska
Co-Counsel for Plaintiffs